REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action dated May 18, 2007, claims 1-36 were pending. Claims 1-34 were rejected. Claims 35-36 were allowed. In this response, claims 1, 7, 12, 19 and 22-30 have been amended. No claims are canceled. No new matter has been added. Support for the amendments can be found throughout the specification as filed. Applicant reserves all rights with respect to the applicability of the Doctrine of Equivalents.

Amendments

Rejections under 35 U.S.C. § 112, second paragraph
Claims 7, 12, 26, 29, 30 and 33

Claims 7, 12, 26, 29, 30 and 33 stand rejected under 35 U.S.C. §112, second paragraph. In view of the foregoing amendments, Applicant respectfully submit that the rejection has been overcome.

Rejections under 35 U.S.C. § 101
Claims 19-30

Claims 19-30 stand rejected under 35 U.S.C. §101. In view of the foregoing amendments, Applicant respectfully submit that rejection has been overcome.

Rejections under 35 U.S.C. § 102(e)
Claims 1-9, 11-15, 22-26, 31 and 33-34

Claims 1-9, 11-15, 22-26, 31 and 33-34 stand rejected under 35 U.S.C. §102(e) as being anticipated by "The Spider's Apprentice" by Linda Barlow (hereinafter "Linda"). However, Applicant respectfully submits that Applicant's claims 1-9, 11-15, 22-26, 31 and 33-34, as amended, are not anticipated by the cited reference.

Specifically, for example, independent claim 1, as amended, recites:
"receiving a search term for a query;

searching a network of concept terms for terms related to the search term from a plurality of relevant web pages residing on websites located on servers coupled to, wherein the network of concept terms is associated with a subject matter domain having a plurality of predetermined relevant terms, wherein each relevant web page includes at least one of the plurality of predetermined relevant terms, and wherein each related term and the search term appear together in at least one sentence in one of the plurality of relevant web pages;

reformulating the query using the search term and the related terms before performing a search for documents based on the search term;

searching a local database for data terms that match the search term and the related terms, wherein the data terms are generated based on occurrence frequencies within a document residing on the websites; and

in response to matching data terms with the search terms and related terms corresponding to the data terms, retrieving the documents from the respective websites"

(Emphasis added)

Applicant respectfully submits Linda does not disclose or suggest the limitation of matching data terms corresponding to a search term and a related term, the search term and the related term appearing together in one sentence in a web page which includes at least one of predetermined relevant terms of a subject matter domain and the data terms being generated based on occurrence frequencies within a document.

Rather, Linda discloses a concept-based search determining what you mean, not just what you say (Linda, page 2). Linda also describes software determining meaning by calculating the frequency with which certain words appear (Linda, page 2). According to Linda, the concept-based indexing is a good idea but far from perfect (Linda, page 2). Clearly, Linda's concept based search is based on concept-based indexing. According to Linda, (concept based) search result is best when entering a lot of words, all of which roughly refer to the concept to search about (Linda, pages 2-3). Thus, Linda's concept based search determines meaning (concepts) from a query and generates hits from documents indexed with concepts. However, Linda is completely silent about matching data terms corresponding to a search term and a related term, the search term and the related term appearing together in one sentence in a web page which includes at least one of predetermined relevant terms of a subject matter domain and the data terms being generated based on occurrence frequencies within a document.

In order to anticipate a claim, each and every limitation of the claim must be taught by the cited reference. It is respectfully submitted that Linda fails to disclose the limitations set forth above. Therefore, it is respectfully submitted that independent claim 1, as amended, is not anticipated by Linda.

Independent claim 22, as amended, includes similar limitations as noted above. Therefore, for at least the similar reasons as discussed above, it is respectfully submitted that claim 22, as amended, is not anticipated by Linda.

Given that claims 3, 4, 8, 24, 33 and 34 depend from and include all limitations of one of independent claims 1 and 22, as amended, applicant respectfully submits that claims 3, 4, 8, 24, 33 and 34 are not anticipated by Linda.

Rejections under 35 U.S.C. § 103(a)
<u>Claims **10, 12, 15-21, 27-30 and 32**</u>

Claims 10, 12, 15-21, 27-30 and 32 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Linda in view of Liddy et al., US Patent No. 6,026,388 (hereinafter "Liddy"). However, Applicant respectfully submits that applicant's claims 10. 12, 15-21, 27-30 and 32, as amended, are patentable over the cited references.

Independent claims 10, 15, 19 and 27, as amended, include limitations similar to those recited in claim 1, as amended. The rest of the claims depend from one of the above independent claims. It is respectfully submitted that Liddy also fails to disclose or suggest the limitations set forth above.

Rather, Liddy teaches a technique for generating sophisticated representations of the contents of both queries and documents in a retrieval system by using natural language processing techniques to represent, index, and retrieve texts at the multiple levels at which humans construe meanings in writing (Liddy, Abstract). However, nowhere does Liddy disclose or suggest matching data terms corresponding to a search term and a related term, the search term and the related term appearing together in one sentence in a web page which includes at least one of predetermined relevant terms of a subject matter domain and the data terms being generated based on occurrence frequencies within a document.

Further, Linda teaches how to get the most from search engines like AltaVista, Infoseek, Excite, Webcrawler, Lycos, HotBot, and the Yahoo Directory (Linda, page 1). Liddy, on the other hand, is related to the application of natural language processing techniques to the interpretation and representation of computer text files and to the matching of natural language queries to documents with the aid of user interactions (Liddy, col. 1, lines 60-65). Clearly, Lidan and Liddy address quite different issues requiring considerably different approaches. There is neither suggestion nor motivation to combine the teachings of Linda and Liddy.

As such, not only do Linda and Liddy not disclose, individually or in combination, all limitations of claims 10, 12, 15-21, 27-30 and 32, as amended, but the references, considered as a whole, do not suggest the desirability and thus the obviousness of making the combination. It would be impermissible hindsight to combine Linda and Liddy based on Applicant's own disclosure. Even if they were combined, such a combination still lacks the limitations set forth above.

Therefore, for at least the above stated reasons, it is respectfully submitted that independent claims 10, 15, 27 and dependent claims 12, 16-18. 20-21, 28-30 and 32 are patentable over the cited references. Withdrawal of the rejections is respectfully requested.

Allowed Subject Matter

Applicant notes with appreciation the Examiner's indication that claims 35-36 are allowed.
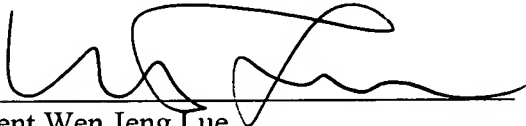
CONCLUSION

In view of the foregoing, applicant respectfully submits that the applicable objections and rejections have been overcome. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

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